

OCT 23 1990

EXPRESS MAIL-
RETURN RECEIPT REQUESTED

Mr. William McGlocklin
SKF USA, Inc.
1100 First Avenue
King of Prussia, PA 19406-1352

Re: Request for Information Pursuant to 42 U.S.C. §9601 et seq.
and 42 U.S.C. §6901 et seq., Cinnaminson Ground Water
Contamination Superfund Site, Burlington County, New Jersey.

Dear Mr. McGlocklin:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and threatened release of hazardous substances into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act, as amended ("CERCLA"), 42 U.S.C. §9601 et seq., and the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq.

EPA has documented the release and threatened release of hazardous substances into the environment at the Cinnaminson Ground Water Contamination Site ("the Site"). Pursuant to Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of RCRA, 42 U.S.C. §6927, EPA may request certain information from parties who handle or have handled hazardous substances and hazardous waste, as those terms are defined in Section 101 of CERCLA, 42 U.S.C. §9601(14), and Section 1004 of RCRA, 42 U.S.C. §6903 respectively. Section 104(b) of CERCLA, 42 U.S.C. §9604(b), enables EPA to conduct such legal and other investigations as it may deem necessary or appropriate to plan and direct response actions, to recover the costs thereof, and to enforce the provisions of CERCLA.

Pursuant to the aforementioned statutory provisions, EPA hereby requires that your company answer the questions in the enclosed "Request for Information". This is a follow-up to EPA's September 4, 1987 "Request For Information" to which you responded on October 26, 1987. Your company's response to this "Request for Information" should be postmarked or received by EPA within fourteen (14) calendar days of your receipt of this letter. The response should be mailed to:

Trevor Anderson
New Jersey Remedial Action Branch
U.S. Environmental Protection Agency
26 Federal Plaza, Room 711
New York, New York 10278

393293



With a copy to:

Deborah Mellott
Office of Regional Counsel
U.S. Environmental Protection Agency
26 Federal Plaza, Room 309
New York, New York 10278

Your company's failure to respond to this "Request for Information" within the time specified above may subject it to an enforcement action under Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5), and/or Section 3008 of RCRA, 42 U.S.C. §6928. An enforcement action may include the assessment of penalties of up to \$25,000 for each day of continued noncompliance.

The notarized signature of an officer or other responsible official of your company must appear on the enclosed "Certification of Answers to Request for Information," which should be attached to the response to this "Request for Information."

Be advised that your company is under a continuing obligation to supplement its response if information unknown or unavailable to your company as of the date of submission of its response should later become known or available to your company. Moreover, should your company find, at any time after the submission of its response that any aspect of the submitted information is false, misleading, or misrepresents the truth, your company is under an obligation to notify EPA as soon as possible. Failure to amend the response may be construed as noncompliance with this "Request for Information." If any part of your company's response is found to be knowingly untrue, the signatory and/or the company may be subject to criminal prosecution.

This "Request for Information" is not subject to the approval requirements of the Paperwork Reduction Act of 1980, in 44 U.S.C. §3501 et seq. If desired, you may assert a business confidentiality claim covering all or part of the information requested. The claim must be supported by each of the four factors specified in Section 104(e)(7)(E) of CERCLA, 42 U.S.C. §9604(e)(7)(E), and must be asserted at the time of submission, by placing on (or attaching to) the information, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and by means of procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

If you have any questions concerning this "Request for Information," you may call either Mr. Anderson at (212) 264-5391 or Ms. Mellott at (212) 264-3299. Please direct any questions from an attorney to Ms. Mellott. Your cooperation is appreciated.

Sincerely yours,

Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

Enclosures

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

1. — A separate response should be given for each question.
2. Precede each answer with the number of the question to which it is addressed.
3. In answering each question, identify all contributing sources of information.
4. Interpret "and" as well as "or" to include within the scope of the question as much information as possible. If two interpretations of a question are possible, use the one that provides more information.
5. If you are unable to give a detailed and complete answer or to provide any of the information or documents requested, indicate the reasons for your inability to do so.
6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number, and the basis for your belief.
7. If a document requested is not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the document with their addresses.
8. For each document produced in response to the "Request for Information," indicate on the document, or in some other appropriate manner, the question to which it applies.
9. If anything is omitted from a document produced in response to the "Request for Information," state the reasons and the subject matter of the omission.
10. In identifying an individual, to the extent possible, provide the name, last known employment, home address and telephone number.
11. As used herein, the term "hazardous substance," "release," "facility" and "person" shall have the meaning set forth in Sections 101(14), (22), (9) and (21) of CERCLA, 42 U.S.C. §9601(14), (22), (9) and (21), respectively.
12. As used herein, the term "hazardous waste" shall have the meaning set forth in Section 1004(5) of RCRA, 42 U.S.C. §6903(5).

13. The term "CERCLA waste material" shall mean any solid, liquid or sludge or any mixture thereof which possesses any of the following characteristics:

- a. it contains one or more "hazardous substances" (at any concentration) as defined in CERCLA, 42 U.S.C. §9601(14);
- b. it is a "hazardous waste" as defined in RCRA, 42 U.S.C. §6904;
- c. it has a pH less than 2.0 or greater than 12.5;
- d. it reacts violently when mixed with water;
- e. it generates toxic gases when mixed with water;
- f. it ignites or explodes;
- g. it is any material which you have reason to believe would be toxic if either ingested, or placed in contact with your skin;

Included in this definition are:

- a. industrial intermediate product;
- b. industrial treatment plant sludge or supernatant;
- c. industrial byproduct having some market value;
- d. coolant water or blowdown waste from a coolant system;
- e. spent product which could be used after rehabilitation;

14. In addition to the facility identified in the cover letter, the term "your facilities" shall include any factories, plants, warehouses, retail stores, or other operations conducted by every entity identified in item 1(a)-(h) in the Request for Information at any time between the years 1960 and 1980, located within a one hundred mile radius of Cinnaminson Township, New Jersey.
15. The terms "you," "your," "company," "facility," and similar terms shall mean all past and present facilities and employees of your corporation, its subsidiaries, parent company and affiliates, unless its meaning is otherwise redefined in any specific question.

REQUEST FOR INFORMATION

1. Was or is SKF Bearing, Inc. a subsidizing or predecessor of your company? Please state any past or present the relationship between your company and SKF Bearing, Inc.
2. Describe the nature of the activities conducted by SKF Bearing, Inc. from 1960 through 1980, including:
 - a) all products which the facility manufactured, supplied, or sold.
3. Describe each waste stream generated by SKF Bearing, Inc. during the years 1960 through 1980, including:
 - a) the process that was the source of each waste;
 - b) the exact composition of each waste;
 - c) the quantity of each waste generated during each of the years 1960 through 1980;
 - d) the method of treatment, storage, and disposal of each waste;
 - e) any analyses made of any waste (Provide copies of all analytical documents.);
 - f) the identity of each person responsible for the treatment, storage, and disposal of each waste including all supervisors and all contractors; and
 - g) all documentation and/or invoices of any waste disposed of by your facility.
4. From 1960 through 1980, did the SKF Bearing facility or any of its past or present employees transport, arrange for transportation, dispose of, or arrange for disposal of:
 - a) any "CERCLA waste material" of any type at the Sanitary Landfill located in Cinnaaminson, N.J.? If so, please state materials and quantities on an annual basis from 1960 through 1980. Include copies of any invoices and/or other documents relevant to your response.
 - b) Solvents, liquid wastes, and/or materials other than CERCLA waste material" of any type at the Sanitary Landfill? If so, specify the solvents, liquid waste, and/or materials and their quantities. Include copies of any invoices and/or other documents relevant to your response.

5. In SKF USA, Inc.'s October 26, 1987 response to an EPA September 1987 Section 104(e) "Request for Information" letter, your company indicated that "non-hazardous refuse only" was disposed of at the site.

a) Please provide a detailed list and description of all "non-hazardous refuse" that was disposed of at the site by your company from 1960 through 1980.

b) Please state the quantities of "non-hazardous refuse" on an annual basis. Provide any documentation of the disposal or transportation of any of the above listed materials.

6. For "CERCLA waste materials" that were sent to the Sanitary Landfill, answer the following questions:

a) Identify each "CERCLA waste material" disposed of at the Sanitary Landfill by the name, composition, and source of origin, and state whether your company generated, handled, and/or transported such wastes or substances.

b) Indicate the amount of each "CERCLA waste material" identified in response to question 6a, above. For liquids, the response would be in terms of volume; for solids, the response should be in terms of weight.

c) Explain how each "CERCLA waste material" identified in response to question 6a, above, was containerized, e.g., drums, bulk solids, tanks, etc., or whether the waste was uncontainerized, e.g., disposed of as bulk liquid. State the dates of disposal of all material at the Sanitary Landfill and describe any labels, numbers, or other markings on the containers and the condition of the containers.

d) Submit a copy of each and every document which relates to the generation, analysis, handling, hauling, and/or disposal of the "CERCLA waste material" identified in response to question 6a, above. If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g., letter, file memo, invoice, inventory form, billing record, record of payment, etc.). Describe the relevant information contained therein and why you are not able to provide the document.

e) Identify by name and job title the person who prepared each document described in question 6d, above.

f) Identify each and every person (e.g., company official, individual, etc.) having knowledge of the facts relating to

the generation and transportation of "CERCLA waste material" for disposal at the Sanitary Landfill. For each such person identified, please provide the name, address and telephone number of that person and the basis of your belief that he or she has such knowledge.

g) Submit a copy of any lease, contract, permit or other written agreement relating to the disposal of "CERCLA waste material" at the Sanitary Landfill. If the documents are unavailable, refer to question 6d, above, for the specific information required.

h) Identify the persons who selected Sanitary Landfill as the location at which "CERCLA waste material" was to be disposed of.

7. Provide the identities of each person responsible for the treatment, storage, and disposal of each waste generated by SKF including all supervisors and all contractors. Specifically identify who selected the waste disposal site.
8. Does SKF use any solvents in its manufacturing processes? If so,
 - a) state the method of treatment, storage, and disposal of these solvents.
9. Submit any additional information which may help EPA to identify companies or individuals who disposed of "CERCLA waste material" at the Sanitary Landfill.
10. State the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA's "Request for Information") and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

TITLE (print or type)

ORGANIZATION (print or type)

SIGNATURE

Sworn to before me this

day of _____, 1990

Notary Public

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Mr. William McGlocklin
SKF Industries
1100 First Avenue
King of Prussia, PA 19406-1352

4. Article Number

P 228 255 047

Type of Service:

- | | |
|---|--|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt
for Merchandise |

Always obtain signature of addressee
or agent and DATE DELIVERED.

5. Signature — Addressee

X

6. Signature Agent

X

7. Date of Delivery

10/25/90

8. Addressee's Address (ONLY if
requested and fee paid)

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS



SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

**RETURN
TO**



Print Sender's name, address, and ZIP Code in the space below.

Mr. Trevor Anderson

26 Federal Plazz, Rm. 711

New York, New York 10278